

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No.

UNDER SEAL

14-MJ-978 (JSM)

MOHAMED ALI OMAR

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about November 6, 2014, in Hennepin County, in the State and District of Minnesota, defendant(s)

knowingly and intentionally threatened a federal officer.

in violation of Title 18, United States Code, Section(s) 115.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

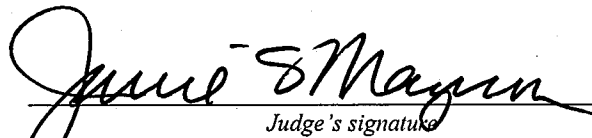
SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No
Complainant's signatureMatthew Parker, FBI Special Agent
Printed name and title

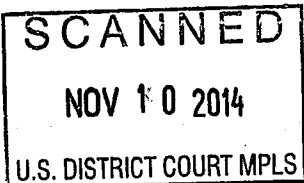
Sworn to before me and signed in my presence.

Date: 11/7/14

City and state: Minneapolis, MN


Judge's signatureThe Honorable Janie S. Mayeron, U.S. Magistrate
Judge

Printed name and title



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	AFFIDAVIT OF MATTHEW
)	PARKER IN SUPPORT OF
Plaintiff,)	APPLICATIONS FOR A
)	CRIMINAL COMPLAINT, AN
v.)	ARREST WARRANT, AND
)	A SEARCH WARRANT FOR
MOHAMED ALI OMAR,)	3536 COLUMBUS AVENUE SOUTH,
)	MINNEAPOLIS, MINNESOTA, A
Defendant.)	SINGLE-FAMILY HOUSE AND
)	ITS DETACHED GARAGE
		14-MJ-978 (JSM)
STATE OF MINNESOTA,)	
)	SS:
COUNTY OF HENNEPIN)	

Matthew Parker, being first duly sworn upon his oath, deposes and states:

1. I am a Special Agent of the Federal Bureau of Investigation and have been for over 15 years. I am currently assigned to the FBI Safe Streets Task Force (SSTF) which investigates, among other things, violations of federal offenses to include assaults on federal officers and threats directed at federal officers.
2. The following is based on my personal investigation, experience, knowledge and observations; investigation by other law enforcement officers; review of law enforcement reports, and upon discussions with persons involved in the investigation of Mohamed Ali Omar. This affidavit does not contain every fact learned during the course of this investigation, only those facts sufficient to support a judicial finding of probable cause that Mohamed Ali Omar (hereinafter

the "defendant" or "OMAR") has committed the federal crime of threatening a federal officer in violation of Title 18, United States Code, Section 115; to issue a warrant for the arrest of OMAR; and to issue a no-knock search warrant directing the search of the following location: 3536 Columbus Avenue South, Minneapolis, Minnesota, a single-family house, fully described in Attachment A, for the items enumerated in Attachment B.

2. On November 6, 2014, Special Agents of the Federal Bureau of Investigation (hereinafter the "F.B.I.") and other federal law enforcement officers were investigating the possible commission of a federal crime.
3. FBI Special Agent J.M. and federal law enforcement officer C.T., who is an officer on an FBI Task Force, went to 3536 Columbus Avenue South, Minneapolis, Minnesota, in the late afternoon of November 6, 2014 to attempt to conduct an interview of a family member of the person whose potential criminal activity concerned law enforcement. Because neither FBI Special Agent J.M. nor Task Force Officer C.T. can communicate in the Somali language, and they anticipated a possible need to communicate with Somali-speakers, they were accompanied by a Somali-English interpreter, who was working for the FBI as a contractor.
4. Upon arrival at 3536 Columbus Avenue South, the federal law enforcement officers parked their car, walked to the front door of the residence and knocked on the door. At this time OMAR's sister parked a car at the curb. The sister, using obscene language and a loud voice, told the federal law enforcement officers that

she blamed them, and their surveillance earlier in the day, for her being pulled over at the airport earlier on November 6.

5. The door to 3536 Columbus Avenue South was opened at this point by OMAR. He began directing obscene language at the federal law enforcement officers, told them he would sue them, and told them they needed a search warrant to come to his house and knock on his door. OMAR stated that he blamed the FBI for him being "harassed" by law enforcement.
6. Using the Somali language, OMAR's sister began berating the interpreter. The interpreter later told the federal law enforcement officers that OMAR's sister had told the interpreter he was a dog, a snitch, and garbage. According to the interpreter, when the interpreter told the sister to calm down because her profanity and behavior was making her look like garbage herself, OMAR stated to the interpreter that if the interpreter spoke to his sister again, he, OMAR, would "put down" the interpreter. OMAR then made this threatening statement again. OMAR and his sister told the agents and interpreter to "get the fuck off" their property.
7. OMAR then stated, in the English language, words to the effect that he had a permit to carry, and that if they came back he, OMAR, would get them. OMAR said that the agents knew his history. The agents understood this language to be directed at both them and the interpreter.
8. The history to which OMAR referred includes the following:

- On March 2, 2013, OMAR was arrested by the Minneapolis Police Department for aggravated robbery. The Minnesota state crime of aggravated robbery, Minn. Stat. § 609.245, includes as one of its elements the use, threatened use, or implied possession of a dangerous weapon, or the infliction of bodily harm, during the commission of a robbery.
- On September 22, 2013, OMAR was shot six times at an address on Lake Street in Minneapolis. When asked, OMAR told law enforcement that he believed the motive for this shooting to be that he hangs with people who are rivals of the person who shot him. Given the suspected gang affiliation of the shooter, this would mean that OMAR hangs with members of the Somali Outlawz, a gang. In 2010, OMAR was arrested while in the company of members of the Somali Outlawz.
- On January 25, 2014, OMAR was arrested by the Minneapolis Police Department for carrying a loaded .44 magnum pistol without a permit.
- On October 16, 2014, OMAR was arrested by the Minneapolis Police Department for carrying a loaded semi-automatic pistol without a permit.
- OMAR has no criminal convictions; the foregoing are only arrests.

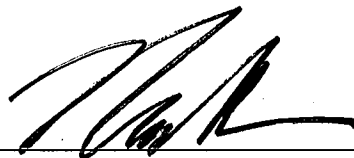
9. Federal law enforcement officers J.M. and C.T. observed a young woman standing just inside the front door of 3536 Columbus Avenue South who appeared to be

videotaping the encounter between agents and Mohamed and his sister. J.M. and C.T. observed that she appeared to be using a smartphone.

10. OMAR's multiple arrests for carrying a loaded handgun without a permit, and the presence of a pistol in his most recent Facebook profile page indicate to your affiant that OMAR is able to re-supply himself with handguns, and that the fact that the police have seized a gun from him does not mean that OMAR no longer has a handgun.
11. Your affiant has looked at a photograph of OMAR's Facebook page. OMAR's Facebook profile photograph was changed approximately 48 hours ago. The Facebook profile now shows OMAR seated in a vehicle. There is a pistol on the seat beside him.
12. Your affiant takes OMAR's statement that if law enforcement comes back he will "get" them, coupled with a reference to OMAR's history, to be a threat that if law enforcement comes to 3536 Columbus Avenue South, OMAR will shoot at them. Your affiant therefore respectfully asks that law enforcement be authorized to execute a search warrant at 3536 Columbus Avenue South without first knocking and announcing.

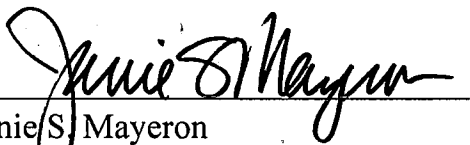
13. 3536 Columbus Avenue South, Minneapolis, Minnesota, is a beige colored, single family residence with a dark brown front door. A set of concrete steps leads from the sidewalk to the yard area, and a set of three additional steps leads to the open front porch of the property. A half-circle shaped window is to the right of the front door as an observer faces the house. A detached garage is accessible off the alley behind the house.

FURTHER YOUR AFFIANT SAIETH NOT.



Matthew Parker
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 7th day of November, 2014



Janie S. Mayeron
United States Magistrate Judge